



A Response Objecting to Outline Planning Application Ref W 15/ 02761 460 Houses off Cheltenham Road, Evesham

Response Prepared by – The Vale of Evesham Civic Society

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Our involvement

Our involvement on the Cheltenham Road application has been since proposals were presented at a public consultation in April 2015. We contacted the developer with our thoughts via email setting out some initial observations. With the publication of the outline application by Bloor Homes for Cheltenham Road and the proposals set out in the SWDP, we were persuaded to hold a public meeting on 12th November 2015 to provide information on the Application and Plan. As a “Civic” society we considered it our responsibility to express those opinions and further investigate the implications the proposal would have on the community.

The National Planning Policy Framework requires that planning should be genuinely plan-led, empowering local people to shape their surroundings and setting out a positive vision for the future of the area.

Objection Based on Local Authority Requirements

Without acknowledgement of the objections contained in our SWDP submission, dated 19th November 2015, the current SWDP proposes that either 450 or 500 are recommended for the area as defined in the SWDP..

There are 3 distinct areas within that SWDP proposed area:-

The Outline Planning Application 15/02761 for up to 460 dwellings (Area 1)

An area of 12.5 hectares, marked as Existing Employment Site on the application (Area 2)

Application No 14/025025 for 49 dwellings pending consideration. (Area 3)

The number of houses proposed for Areas 1 & 3 exceed the maximum under consideration as part of the SWDP proposals without Area 2 being included.

The application should be refused on the basis that it exceeds the proposals as defined in the SWDP.

Transport Submission

Lack of provision for future relief road off the A46 trunk road roundabout.

- It is considered that this link is now needed, both to cater for the additional traffic generated by new housing off Cheltenham Road and the new housing being built and planned off the B4084 Pershore Road in Hampton.
- It is accepted that such a "link" may have weight and width restrictions because of any possible heavy goods traffic impact on Pershore. It should be noted that this link is shown in the Evesham Town Plan, page 35. In 'Traffic Priority areas for action', action 3 reads, 'Make provision for and safeguard an extension of the Evesham ring road around the south west side of the town to connect the A46 and the B4084.'
- To accommodate this future need any such link should not have housing directly off it to prevent hazard and congestion and as a consequence will lead to overdevelopment on the proposed site that remains.

Impact on Cheltenham Road

- This application is for 460 houses and there is already an application awaiting consideration for 49 houses in this area, both on part of SWDP proposed development site. Within 150 metres there will be numerous junctions on to Cheltenham Road, three leading to the developments mentioned and two to the existing Thistledown opposite. There is also a main junction proposed with the A46 Trunk Road Roundabout opposite the Football Ground leading to the Employment Land, noted in the SWDP and now proposed for development by St. Modwyn

Impact on the A46 National Highways trunk road.

- A site access is off the A46 roundabout and shares that with A 46, two junctions, Cheltenham Road, Football Club and the proposed development by Modwyn as previously mentioned. This is also noted on Highways England Letter and Response dated 8th Dec 2015.
- The infrastructure work needed to upgrade this junction will be considerable and only a few years since the Football Club, at their own expense, were obliged to reconstruct it.
- This road is often blocked by sheer volume of traffic, it has only two lanes and acts as a relief road to the residents to try and avoid the congestion in Evesham.
- There have been occasions when the M5 motorway is closed or delayed and the A46 is used to divert or escape the congestion.
- There have been numerous accidents on one or other of the six roundabouts around Evesham causing complete gridlock.
- This is commented on to ensure the necessary infrastructure especially Highways, Pedestrian and Cycle way provision are in place prior to development commencing, as noted in the SWDP. Present experience has indicated this prior infrastructure work, as noted in the following Strategy, is not being carried out at Hampton where work has commenced on two sites for 500 houses.

SWDP Strategy

SWDP1 Development Strategy and Settlement Hierarchy paragraph 4 says: - Development will be infrastructure led where new development is infrastructure dependent. At SWDP3, Sustainable Development Principles, development proposals must: *'Ensure both the strategic and local road network will be capable of safely, without undue environmental consequences, accommodating the type and volume of traffic likely to be generated.'*

It is stated in the SWDP Infrastructure Development Plan that all necessary infrastructure will need to be in place before the appropriate stage of development is commenced. In the case of Evesham's transport infrastructure, we do not think it would be possible to provide the transport infrastructure necessary to cater for existing and future transport needs without new roads and bridges. Such provision would be disruptive and expensive.

The Role and Capability of Worcestershire County Council

The Council as Highway Authority for the local road network is expected to provide reliable and expert advice on any changes including traffic generation due to new developments. The WCC Local Transport Plan 3, 2011-2026 which has the aim of, 'delivering a transport strategy that is of greater efficiency and makes better use of resources to meet economic, environmental and social challenges'.

The Local Transport Plan has nine over-arching objectives, two of which are:

- The reduction of congestion;
- The securing of infrastructure and services to support development.

It is noted that Highways England have objected to the application but that Worcestershire County Council raised no objection to the application on traffic grounds or its impact on road network in Evesham

We challenge the ability of the Council to provide proper advice. This is based on two pieces of evidence

- The County Council has failed to respond as required to many major Planning Applications in recent years. Often there is no comment at all or just a comment requiring a Travel Plan to be provided. It is understood that the County Council staffing levels in the appropriate department have been cut making proper assessment difficult for the staff that remain
- There is no Evesham Transport Model that can be used as a sensitivity test for the modelling required to provide a Transport Assessment.
- The County Council when judging the implications of large developments and providing information to the Planning Authority have had to rely on the 'Evesham Transport Model' which is spreadsheet based. We understand that this is not fit for purpose, it is difficult to use and has been unavailable at times. We now understand that the County Council are considering the commissioning of a VISSIM Micro Simulation model for Evesham.

We therefore feel that the County Council should have objected to previous planning applications due to the detrimental effect on traffic levels in Evesham, and especially on the roads leading to the two bridges. We feel sure that they cannot be relied upon in advising on future traffic levels which would be generated by the Application, at least until the VISSIM model is available.

We therefore have no trust in the County Council's comments (or lack of them) with regard to the ability of the road system to cope with future needs.

Evesham Highway Network

Evesham's highway network has been much criticised over the years and this was shown in the Town Plan consultation where easily the most negative aspect of Transport was considered to '*Traffic congestion and system*' (page 32 of the Appendix).

The system is constrained by the river Avon and the narrow streets between Workman Bridge and the High Street. Workman Bridge is effectively one way and this means that Abbey Bridge takes all of the traffic from the Town Centre towards Hampton and Bengeworth.

Evesham's current traffic situation

Day to day evidence shows that the queues and delays are a daily occurrence and this often occurs throughout the working day. In the northbound direction, there are queues reaching back to the A46 along Cheltenham Road and in the eastbound direction from the Cheltenham Road junction with Abbey Road Bridge the queues extend back into Hampton along Pershore Road. The critical junction in the town is at Abbey Road/Waterside/Pershore Road/Cheltenham Road and this has been stated to be over capacity by Worcestershire County Council Highway Officers.

It is the opinion of local people that the traffic situation has got much worse this year.

Factors which affect the traffic situation.

1. Abbey Bridge /Waterside junction

Abbey Bridge reopened in March 2014. The bridge carriageways have been widened, but the main change affecting traffic flow was the change to the Abbey Road/Waterside junction. The junction had much needed pedestrian facilities included and this has restricted the capacity of the junction.

2. Continued Housing Development

Evesham has seen continual housing development over the past few years. This has put increasing pressure on the road system which will continue to increase as the new houses are completed and occupied.

There are 1500 Houses now being built or recently completed. Including the application site there are 1000 houses proposed as well as St Modwyn's proposals to extend the Vale Industrial Park

The SWDP assumed that it will be a programme of development for the next 15 years, but it is more likely that employment land off Vale Park (SOC046 - added in 2012), 400 homes off Cheltenham Road and 200 houses off Abbey Road (SWDP50/7- added in 2012) will progress within the next 5 years. The Wychavon District Local Plan says that development may be permitted so long as it does not have an adverse impact on particular issues including, 'the efficient operation of the transport network'

3. Waitrose Store Development

The Planning Application for the Waitrose Store in Merstow Green was approved in February 2015. The store will attract considerable numbers of cars and some HGV trips which will put further pressure on the Cheltenham Road to access the Town Centre road system

4. Category 1, 2 & 3 Villages as defined in the SWDP

Many of these villages are within a 5 mile radius of Evesham. They are dependent on the town for goods and services. They also are being greatly developed and in some cases fall within the SWDP proposals. Traffic generated and increased demands on essential services by these villages, impact initially on the A46 trunk road roundabouts and then within the town.

We object to the proposal on transport grounds due to its impact on the A46 trunk road, road systems in and around Evesham, in particular Cheltenham Road and the Abbey Road Bridge junction, and for future relief road provision off the A46 trunk road roundabout linking to the B4084 at Hampton as noted on the Town Plan

Other infrastructure issues

Pollution

Concern has been expressed in the past about pollution from traffic in areas of congestion. With frequent queuing throughout the town and along Cheltenham Road.

Doctors Surgeries

In response to our enquiries we received one reply highlighting the current position

“As you will be aware there has been a tremendous increase in housing throughout Evesham and surrounding villages. It was always my belief that building on this scale would generate / trigger section 106 money to help deal with the increase in costs associated with infrastructure; Schools, Health etc. Not one penny has been allocated to primary care to my knowledge, and when we questioned this a couple of years ago the District Council informed us that it had already been allocated.”

We note there is provision in the SWDP for a Development Levy and, as with many of the terms and phrases used, it is confusing to the reader. We assume this is part 106 agreement and it seems no information is provided on how it is distributed, it is essential this is seen to be used for community benefit when attached to increased development.

Storm and Foul Drainage

The drainage systems in Evesham are largely a product of the Victorian Era, often a combined system and in some cases in the older parts of the town reliant on brick culverts to carry sewage. The town is very liable to flooding and as a consequence pollution can be caused to residential areas, Port Street, Waterside, Pershore Road to Hampton and along the flood plain of the Avon and Isbourne Rivers. This will impact on both the proposals for Abbey Road and Evesham and in both instances form a major part within the open space proposals for any development. These areas will be by definition open to the public and as such pose a potential health risk when accessed after periods of flooding.

James Powell (Environmental Health Consultant) has submitted an objection to the revised SWDP, part of his submission refers to the old drainage systems. Two large syphons from east and west pass under the River Avon to Sewage Works on Corporation Meadow. 50 years ago a treatment plant was constructed west of Evesham to meet the increased demands of the town, since then very little has been done to improve the system.

New developments are constructing large holding tanks and pumping chambers to pump effluent via a small diameter pipe into the old drainage systems. The new developments are experiencing many problems with this system, residents experiencing blockages on a regular basis (Persimmon Homes 150 new homes off Cheltenham Road).

The other means of disposal of surface water is via storm drains to lagoons and filter beds, these are rendered ineffective at times of flooding as will be the case on Cheltenham Road and Abbey Road.

The opportunity for pollution occurring in our watercourses and rivers is considerable with these new developments and will raise issues in the future for public health.

We object to the proposal on the grounds of lack of existing infrastructure impacting on Schools, Surgeries, Health Centres, Hospitals, Community Facilities and because of the overburden on out existing public utilities and antiquated drainage systems